

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LYNAE MCREYNOLDS)	
)	
Plaintiff,)	
)	
v.)	No. 08 CV 3040
)	Honorable Marvin E. Aspen
GRAYMILLS CORPORATION)	
)	
Defendant.)	

JOINT PROPOSED DISCOVERY PLAN PURSUANT TO RULE 26(f)

Defendant Graymills Corporation (“Graymills”) and Plaintiff Lynae McReynolds (“McReynolds”) submit this joint written report as required by Rule 26(f) of the Federal Rules of Civil Procedure.

1. **Meeting.** Pursuant to Fed. R. Civ. P. 26(f) the following counsel have met and conferred regarding the proposed schedule below:

William B. Thompson for Plaintiff
P.O. Box 584
Wheaton, Illinois 60189-0584
(630)690-1971

Dawn Cutlan Stetter for Defendant
MCGUIRE WOODS, LLP
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Chicago, IL 60601-1815
(312) 849-8100

2. **Initial Disclosures.** Disclosures pursuant to Fed. R. Civ. P. 26 (a) to be made by September 22, 2008.

3. **Discovery Plan:** The parties propose this discovery plan:

a. Discovery will be needed on the following subjects: Liability, defenses and damages.

b. All discovery to be commenced in time to be completed by April 30, 2009.

c. The parties expect they will need fewer than 10 depositions collectively.

d. Dates for reports from retained experts under Rule 26(a)(2): **Not applicable at this time, but the parties reserve the right to name experts and/or rebuttal experts if discovery warrants use of same.**

e. All potentially dispositive motions should be filed by May 30, 2009.

f. Pre-trial order and trial to be set at a later date.

4. **Settlement.** On Monday, August 18, 2008, Plaintiff's counsel sent a letter containing a settlement demand to counsel for Defendant. Counsel for Defendant is currently reviewing Plaintiff's settlement demand with her client.

Dated: August 20, 2008

By: /s William B. Thompson (by consent) By: /s Dawn C. Stetter

William B. Thompson
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Joel H. Spitz
Dawn Cutlan Stetter
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CERTIFICATE OF SERVICE

I, Dawn Cutlan Stetter, an attorney, hereby certify that on August 20, 2008, I caused a copy of the foregoing *PARTIES' JOINT PROPOSED DISCOVERY PLAN PURSUANT TO RULE 26(f)* to be served by e-mail through this Court's CM/ECF filing system and regular mail, postage prepaid, upon the following:

William B. Thompson
Attorney for Plaintiff
P.O. Box 584
Wheaton, Illinois 60189-0584

By: /s Dawn Cutlan Stetter

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